

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

DR. WILLIAM TOMASZEWSKI, Individually and on Behalf of All Others Similarly Situated,

Plaintiff,

vs.

TREVENA, INC., MAXINE GOWEN and ROBERTO CUCA,

Defendants.

Case No. 2:18-cv-04378-CMR

CLASS ACTION

MOTION OF HUSEYIN ERENOGLU TO CONSOLIDATE RELATED ACTIONS, FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF COUNSEL

TONY MASTOPIETRO, individually and on Behalf of All Others Similarly Situated,

Plaintiff,

vs.

TREVENA INC., MAXINE GOWEN and ROBERTO CUCA,

Defendants.

Case No. 2:18-cv-04426-CMR

CLASS ACTION

WESLEY LOUIS, individually and on Behalf of All Others Similarly Situated,

Plaintiff,

vs.

TREVENA, INC., MAXINE GOWEN, DAVID SOERGEL, CARRIE BOURDOW, JONATHAN VIOLIN and ROBERTO CUCA,

Defendants.

Case No. 2:18-cv-04779-CMR

CLASS ACTION

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that pursuant to Section 21D of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4, as amended by the Private Securities Litigation Reform Act of 1995, and Rule 42(a) of the Federal Rules of Civil Procedure, class member Huseyin Erenoglu hereby moves this Court, the Honorable Cynthia M. Rufe, United States District Judge, for an Order:

- (a) consolidating the above-captioned related actions;
- (b) appointing Mr. Erenoglu as Lead Plaintiff of the consolidated actions; and
- (c) approving Mr. Erenoglu's selection of Bernstein Liebhard LLP as Lead Counsel and

The Weiser Law Firm, P.C. as Liaison Counsel for the proposed Class.

This motion is supported by the accompanying Memorandum of Law, the concurrently filed Declaration of Daniel Sadeh, the pleadings and other filings in this action, and such other written or oral argument as may be permitted by the Court.

Respectfully submitted,

Dated: December 10, 2018

THE WEISER LAW FIRM, P.C.

/s/ Christopher L. Nelson
Christopher L. Nelson (PA Bar #85609)
22 Cassatt Avenue
Berwyn, PA 19312
Telephone: (610) 225-2677
Facsimile: (610) 408-8062
Email: cln@weiseralawfirm.com

Proposed Liaison Counsel for the Proposed Class

BERNSTEIN LIEBHARD LLP
Stanley D. Bernstein
Laurence J. Hasson
Daniel Sadeh
10 East 40th Street

New York, NY 10016
Telephone: (212) 779-1414
Facsimile: (212) 779-3218
Email: bernstein@bernlieb.com
lhasson@bernlieb.com
dsadeh@bernlieb.com

*Counsel for Huseyin Erenoglu and Proposed
Lead Counsel for the Proposed Class*

CERTIFICATE OF SERVICE

I, Christopher L. Nelson, hereby certify that on December 10, 2018, a true and correct copy of the annexed **MOTION OF HUSEYIN ERENOGLU TO CONSOLIDATE RELATED ACTIONS, FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF COUNSEL** was served in accordance with the Federal Rules of Civil Procedure with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all parties with an email address of record who have appeared and consented to electronic service in this action.

Dated: December 10, 2018

/s/ Christopher L. Nelson
Christopher L. Nelson